

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

AVE GREENEVILLE LLC,

Plaintiff,

v.

**FIRST COMMUNITY BANK OF
EAST TENNESSEE,**

Defendant.

Case No. 2:23-cv-00022

**Judge Curtis L. Collier,
Magistrate Judge Cynthia R.
Wyrick**

JURY DEMAND

DISCOVERY PLAN

In accordance with Fed. R. Civ. P. 26(f)(3), the parties jointly propose the following discovery plan:

- 1. Rule 26(f)(3)(A):** The parties propose that Rule 26(a)(1) initial disclosures be exchanged on June 30, 2023.
- 2. Rule 26(f)(3)(B):** The parties propose that discovery proceed as to all claims and defenses raised in the pleadings, that discovery not be phased, and that all discovery be concluded by June 30, 2024.
- 3. Rule 26(f)(3)(C):** The parties do not anticipate any issues concerning the disclosure, discovery, or preservation of electronically stored information.
- 4. Rule 26(f)(3)(D):** The parties do not anticipate any issues concerning claims of privilege or protection of work product information.
- 5. Rule 26(f)(3)(E):** The parties do not propose changes to the limitations on discovery contained in the federal rule or the local rules.

6. Rule 26(f)(3)(F): The parties do not propose that the Court issue any orders other than the Court's standard Scheduling Order.

Respectfully submitted,

/s/ Eugene N. Bulso, Jr.

Eugene N. Bulso, Jr. (No. 12005)

BULSO PLC

155 Franklin Road, Suite 400

Brentwood, Tennessee 37027

(615) 913-5191

gbulso@bulso.com

Attorneys for Plaintiff

s/Mark S. Dessauer

William C. Argabrite, Esq. (006080)

Mark S. Dessauer, Esq. (010421)

HUNTER, SMITH & DAVIS, LLP

1212 North Eastman Road

Post Office Box 3740

Kingsport, Tennessee 37664-0740

(423) 378-8840; Fax: (423) 378-8801

Attorneys for Defendant